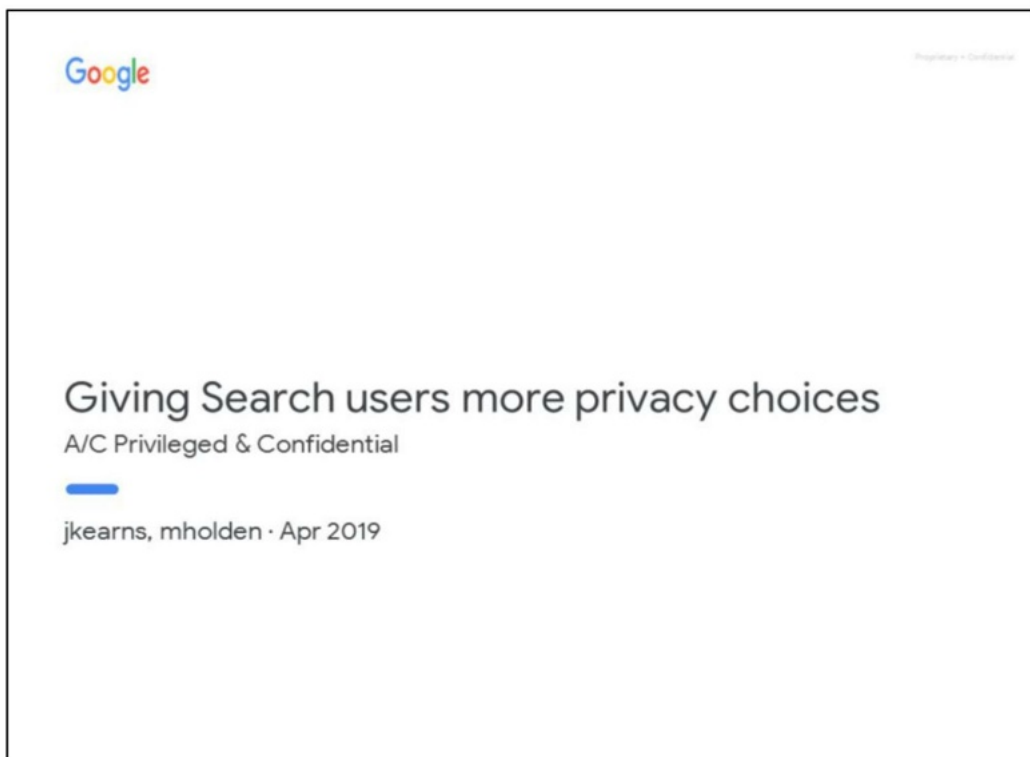
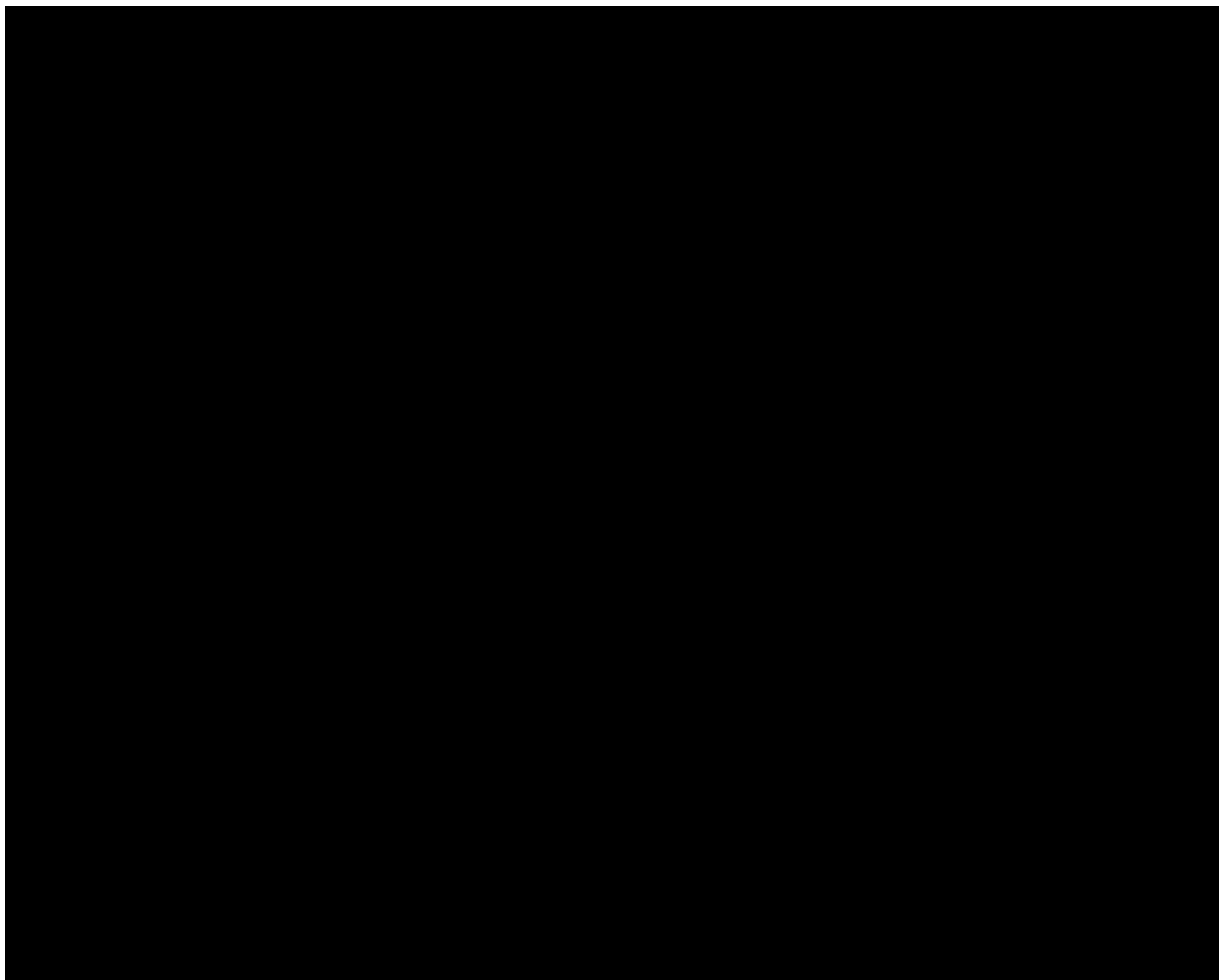


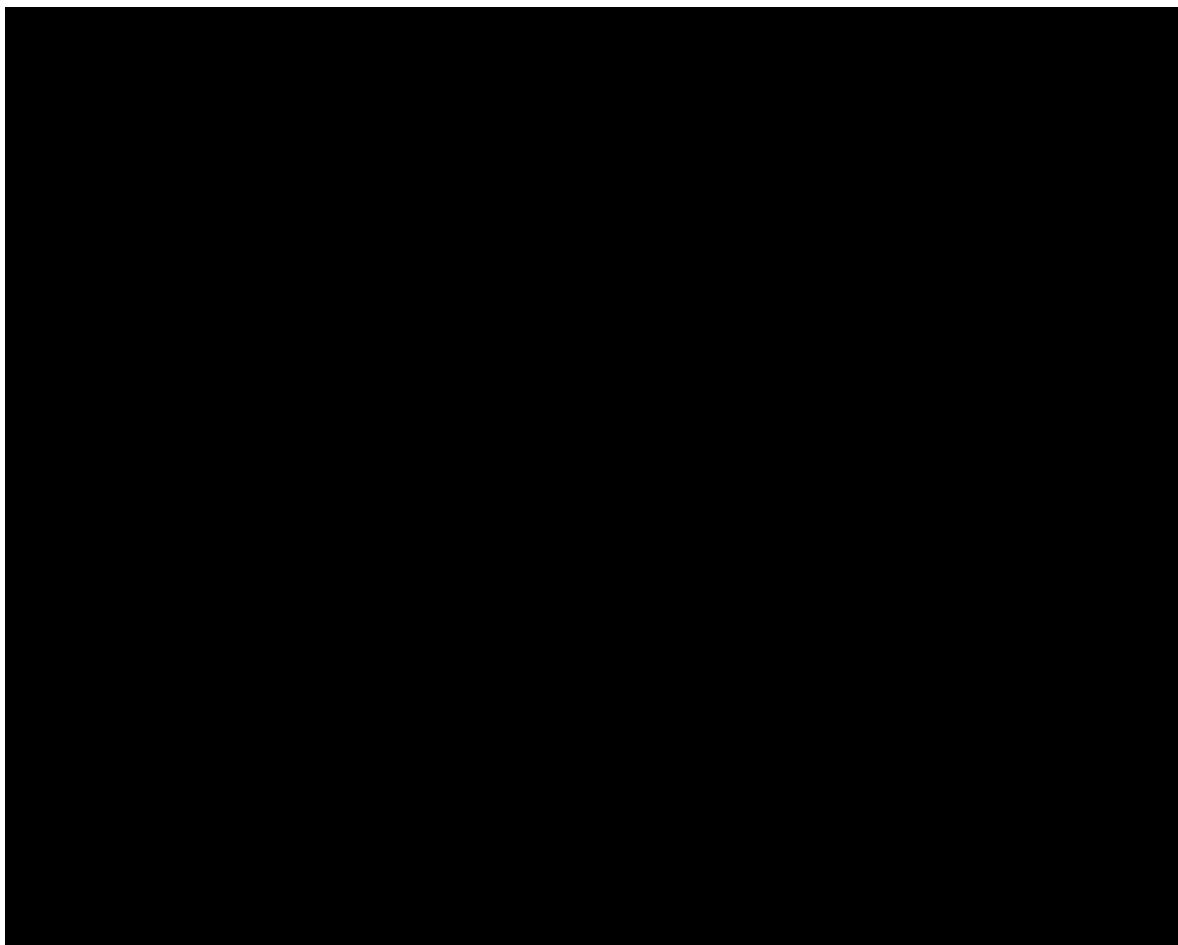
**PLAINTIFFS' MOTION IN
LIMINE NUMBER 5 TO
PRECLUDE GOOGLE
FROM INTRODUCING
DISPARAGING EVIDENCE
OR ARGUMENT**

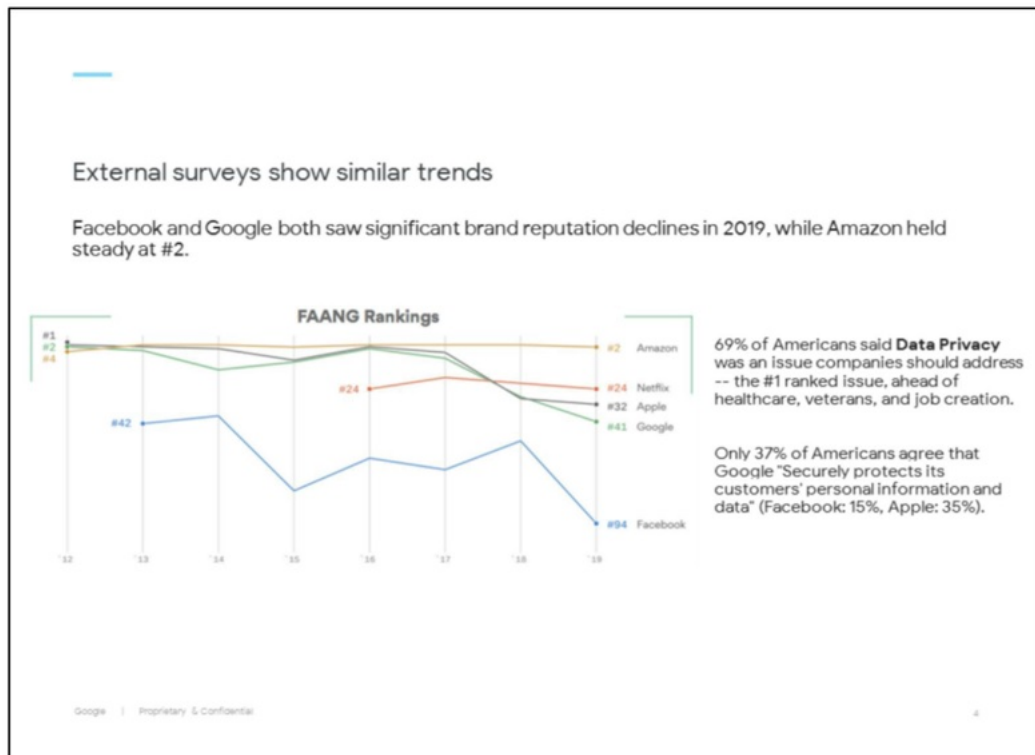
EXHIBIT D

**Unredacted Document Sought
to be Sealed**









Source: The Harris Poll
 Facebook dropped -43 in ranking; Google -13.
 Amazon held steady at #2

Privacy topics continue to draw wide media attention

[Farhad Manjoo](#)
It's Time to Panic About Privacy
April 10, 2019


[Jianan Qian](#)
Feeling Safe in the Surveillance State
April 10, 2019

[Charlie Warzel And Stuart A. Thompson](#)
Tech Companies Say They Care
April 10, 2019

[Sarah Jeong](#)
A.I. Is Changing Insurance
April 10, 2019

We're Not Going to Take It Anymore

We've given up too much control over our digital lives. We need a law to take some of it back.

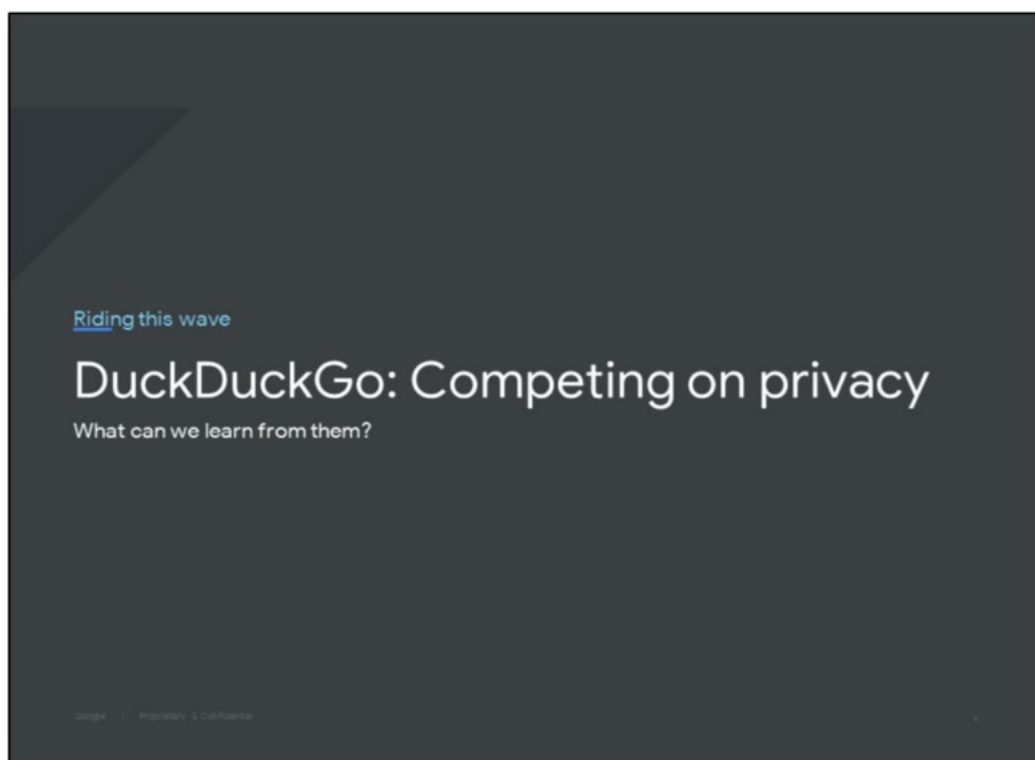


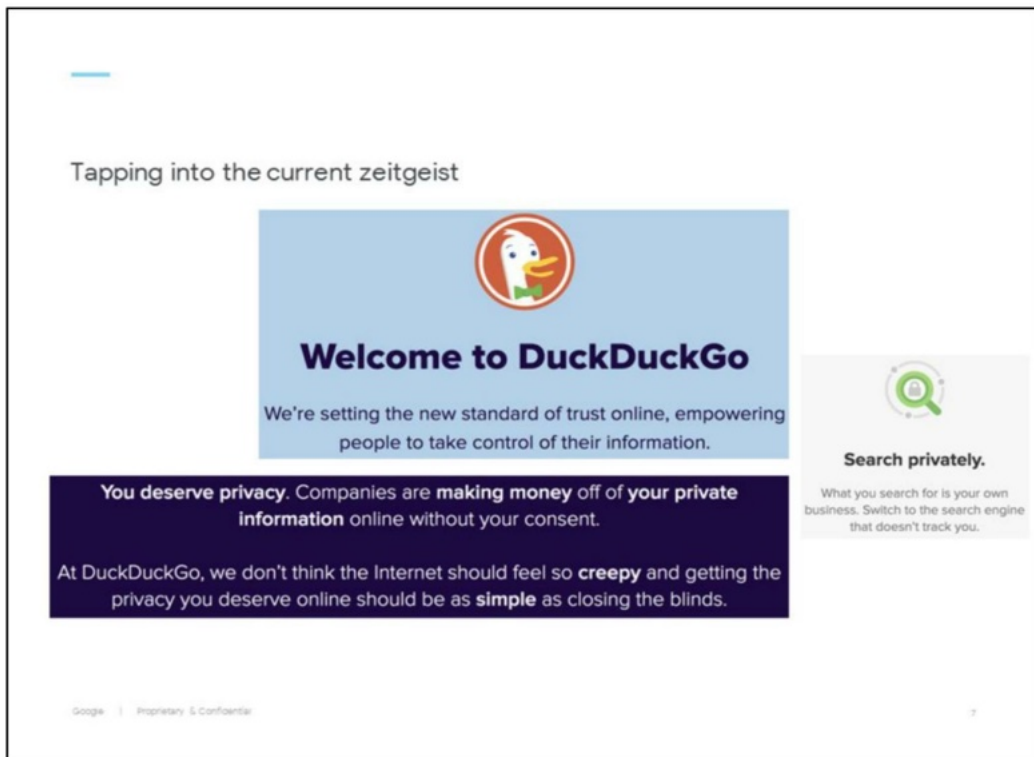
By Kara Swisher
Ms. Swisher covers technology and is a contributing opinion writer.

"Do you want your television-watching linked to your search history linked to your buying data? No, thank you."

Google | Proprietary & Confidential

Articles like this appear almost every week.
This is just a sample from the NYTimes last week.





Source: <https://duckduckgo.com/about>

3 main **selling points**

- "We **don't store** your personal information. Ever."
 - "Google tracks you and we don't."
 - "What you search for is your own business."
- "We **don't follow** you around with **ads**."
 - "Search secrets should remain private and away from the targeting of advertisers."
- "Get unbiased results outside the **filter bubble**"
 - "We're committed to unbiased search that's never based on your search history."

A smart strategy ("**privacy arbitrage**")

Use "big tech" search+ad services, layer on stronger privacy messaging & guarantees to attract users, get revenue/margin from being the entry point.

- **Product (Search) is a known category**
 - No user education needed (product = Google)
- **Business model (Search ads) is established and validated**
 - Targets your query (contextual), not you (behavioral, demographic)
 - A lucrative business - with **zero** personal data needed
 - Syndicate BigCo ads (no need to build a sales team)
- **Leverage \$Bs in investment from other companies**
 - Microsoft/Yahoo provide web indexing and ad serving

Google | Proprietary & Confidential

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Source: <https://spreadprivacy.com/us-senate-testimony/>

Risk #2: Mindshare (KOFs)

By reaching KOFs, press, and influencers, DDG can drive the conversation about privacy.

Blog: [SpreadPrivacy.com](https://spreadprivacy.com/dont-track-us/)
[Don't Track Us!](#)

Twitter: [@duckduckgo](https://twitter.com/duckduckgo) (800k followers)

[Talking points](#) for your friends
[Quora](#)

In contrast, Google is strong on security, but weak on privacy.



Source: <https://twitter.com/walmossberg/status/1085257073892511746>

Risk #3: Policy (Regulators)

Ex: Weinberg testified before the US Senate Judiciary Committee in Mar 2019.

He recommends:

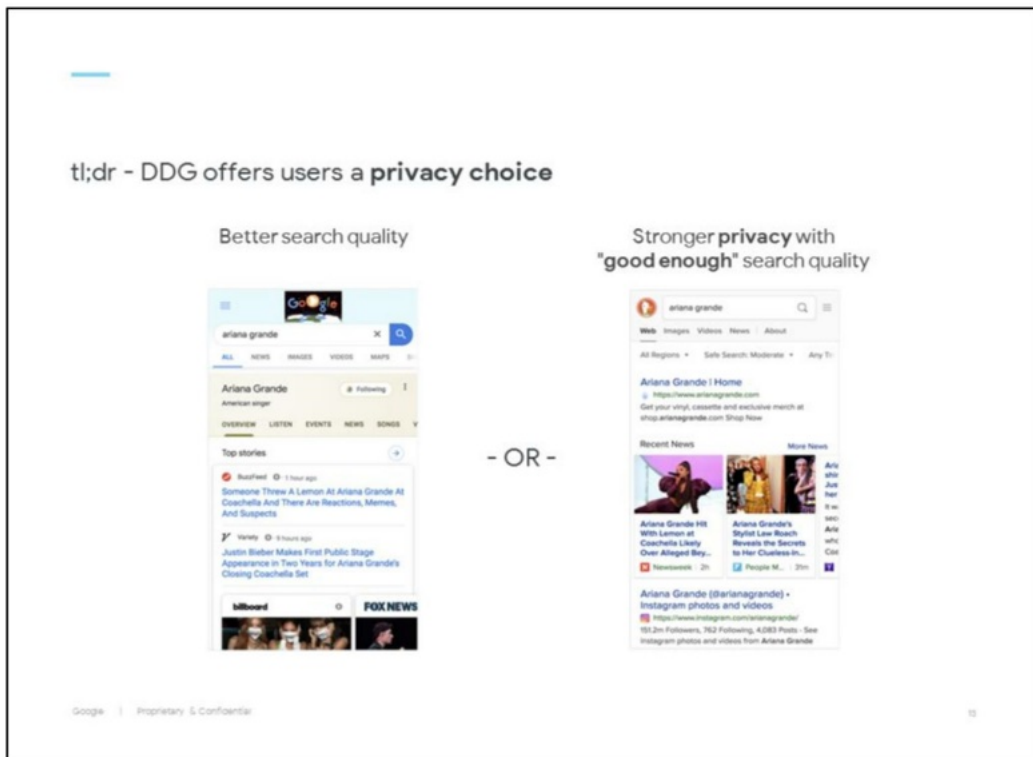
- Strong privacy legislation.
- Allow [opt-out](#) of all online tracking.
- Prohibit large companies from combining data across product lines.
- Block acquisitions.



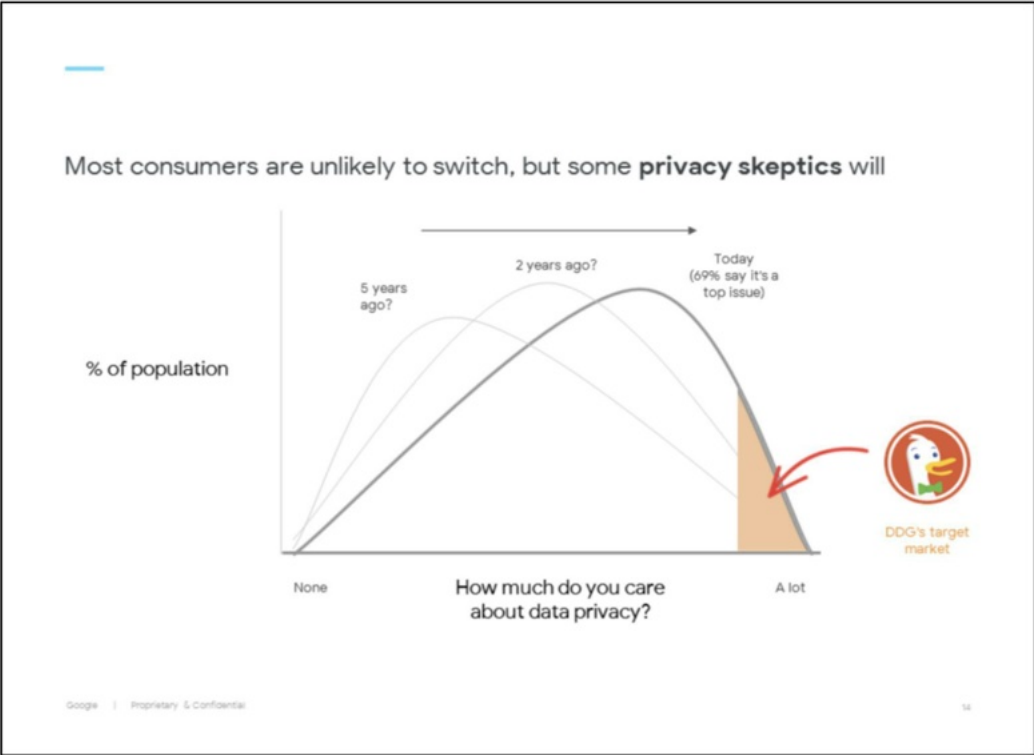
Google | Proprietary & Confidential

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Source: <https://spreadprivacy.com/us-senate-testimony/>



Mossberg (link): DuckDuckGo isn't "quite as good as Google, but I've been surprised at how close they are. And being private more than compensates for any deficiencies, IMO."

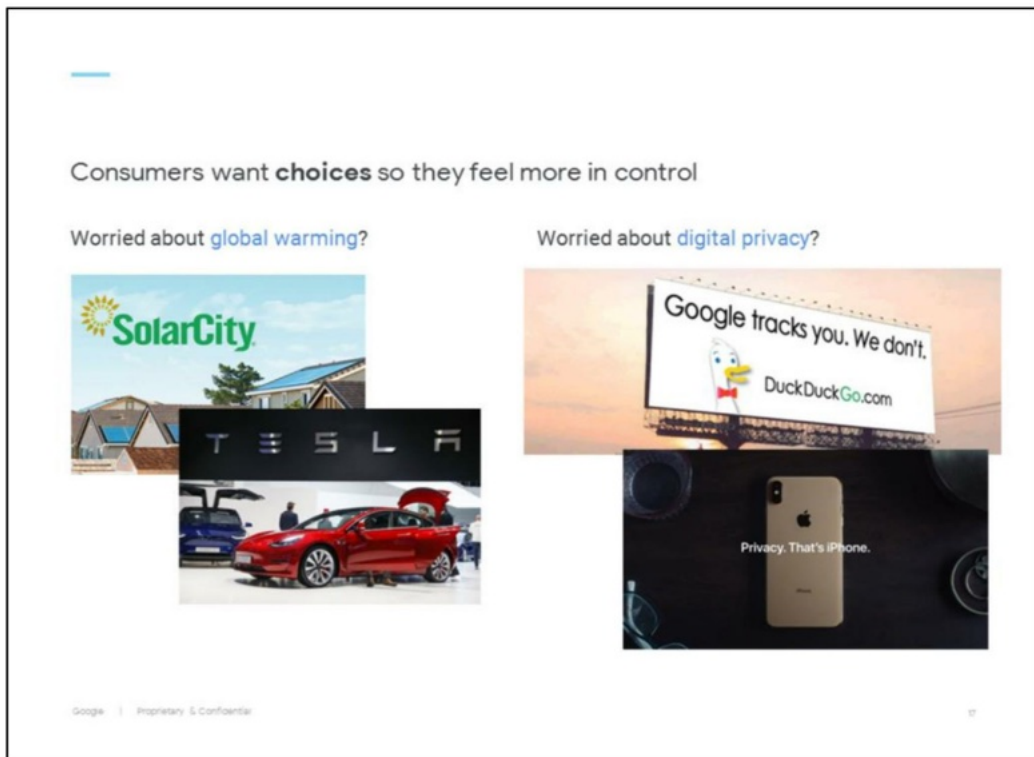




Example academic lit review.



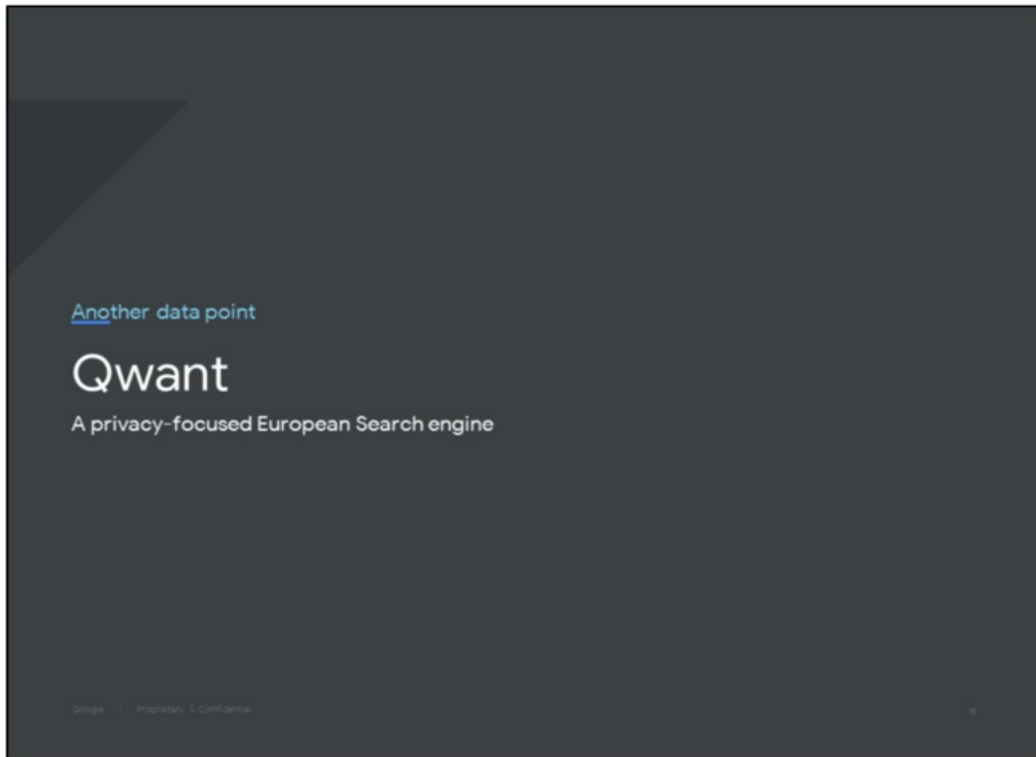
Source: Charlie Warzel (NYTimes)
An example of a hyperobject? (Timothy Morton)




I'm worried about global warming, but also not sure what I can do exactly.

I've called my congresspeople, put solar panels on my roof, and am getting a plug-in Prius. Does this solve the problem? No. But it makes me feel a little more in control, and that I'm helping in some small way.

Privacy may be similar.





Qwant

The search engine that respects your privacy.

Qwant, the European search engine that respects your privacy

Based and designed in Europe, Qwant is the first search engine which protects its users freedoms and ensures that the digital ecosystem remains healthy. Our keywords: privacy and neutrality.

Respecting your privacy

Qwant delivers the best available results to your queries and never tries to guess who you are or what you are doing. We strongly believe that what you search on the Web is an important part of your privacy.

Therefore Qwant never records your searches and never uses your personal data for advertising or other purposes.

Neutrality and impartiality

Qwant allows the whole Web to be visible without any discrimination and with no bias.

Our sorting algorithms are applied equally everywhere and for every user, without trying to put websites forward or to hide others based on commercial, political or moral interests.

Based in Europe

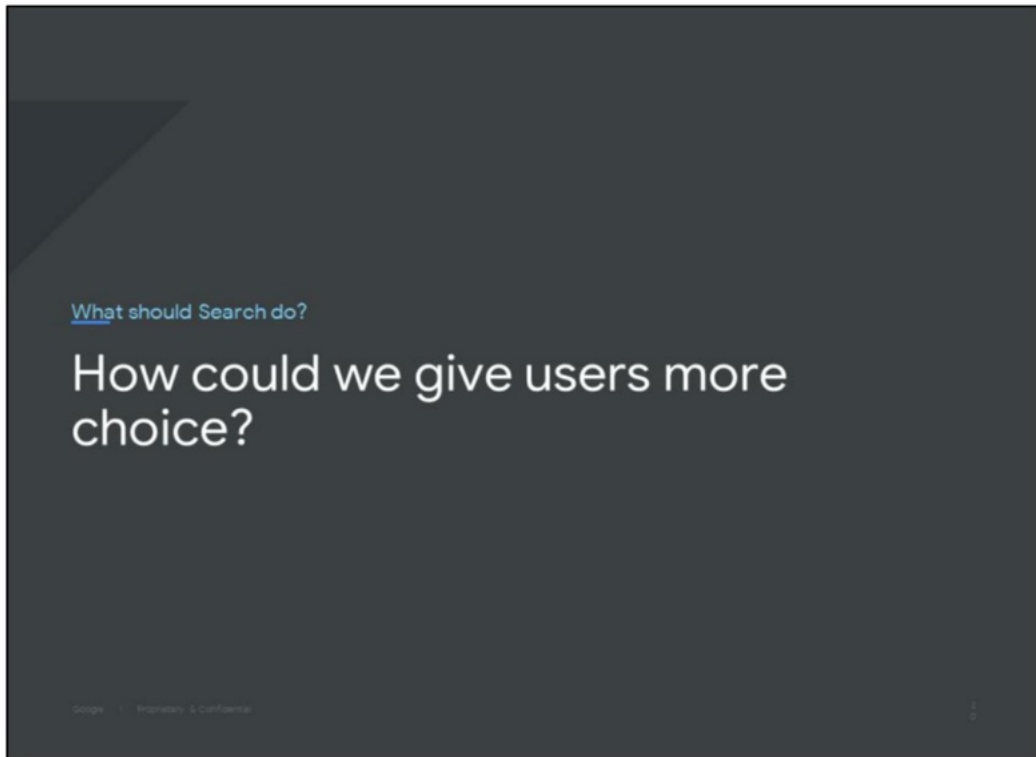
Qwant respects the European laws and cultures, and contributes to developing the digital economy of each of the European Union and European countries.

It is based in France, with headquarters in Paris and teams spread across the territory.

Google | Proprietary & Confidential

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Source: <https://about.qwant.com/>



Focus on the (privacy-conscious) **user**

We shouldn't overly focus on what **competitors** are doing or saying.

Instead, we should ask how we can offer more **privacy choices** to our **users**.

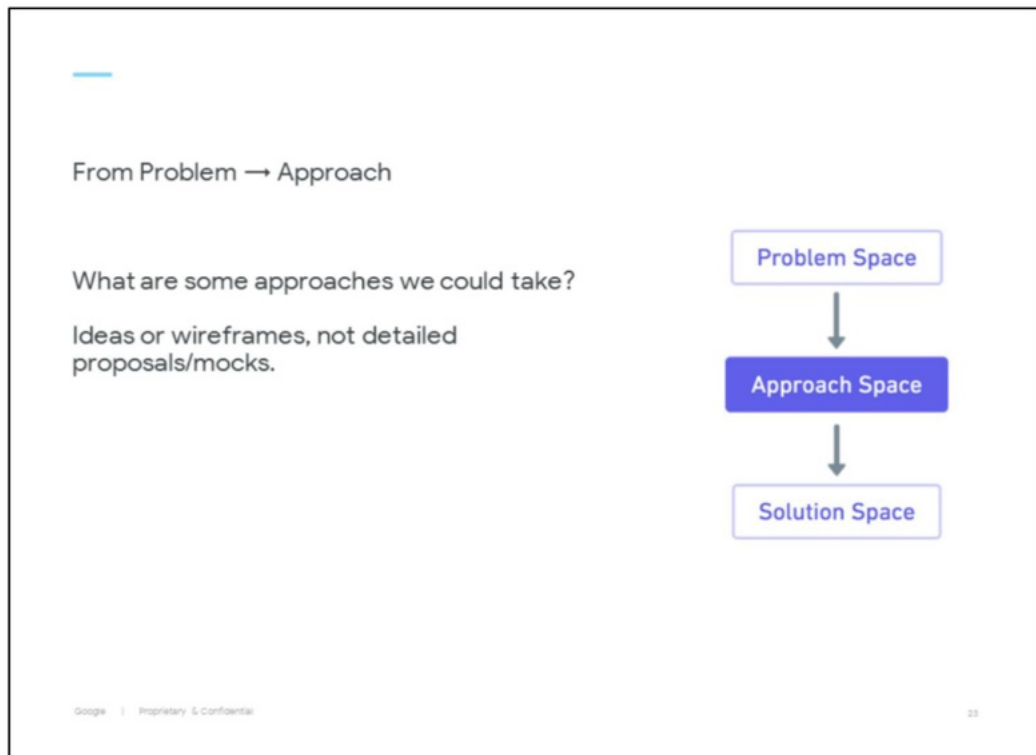
How could we help users feel more **in control**, and in the **driver's seat** about the privacy **trade-offs** they're making?

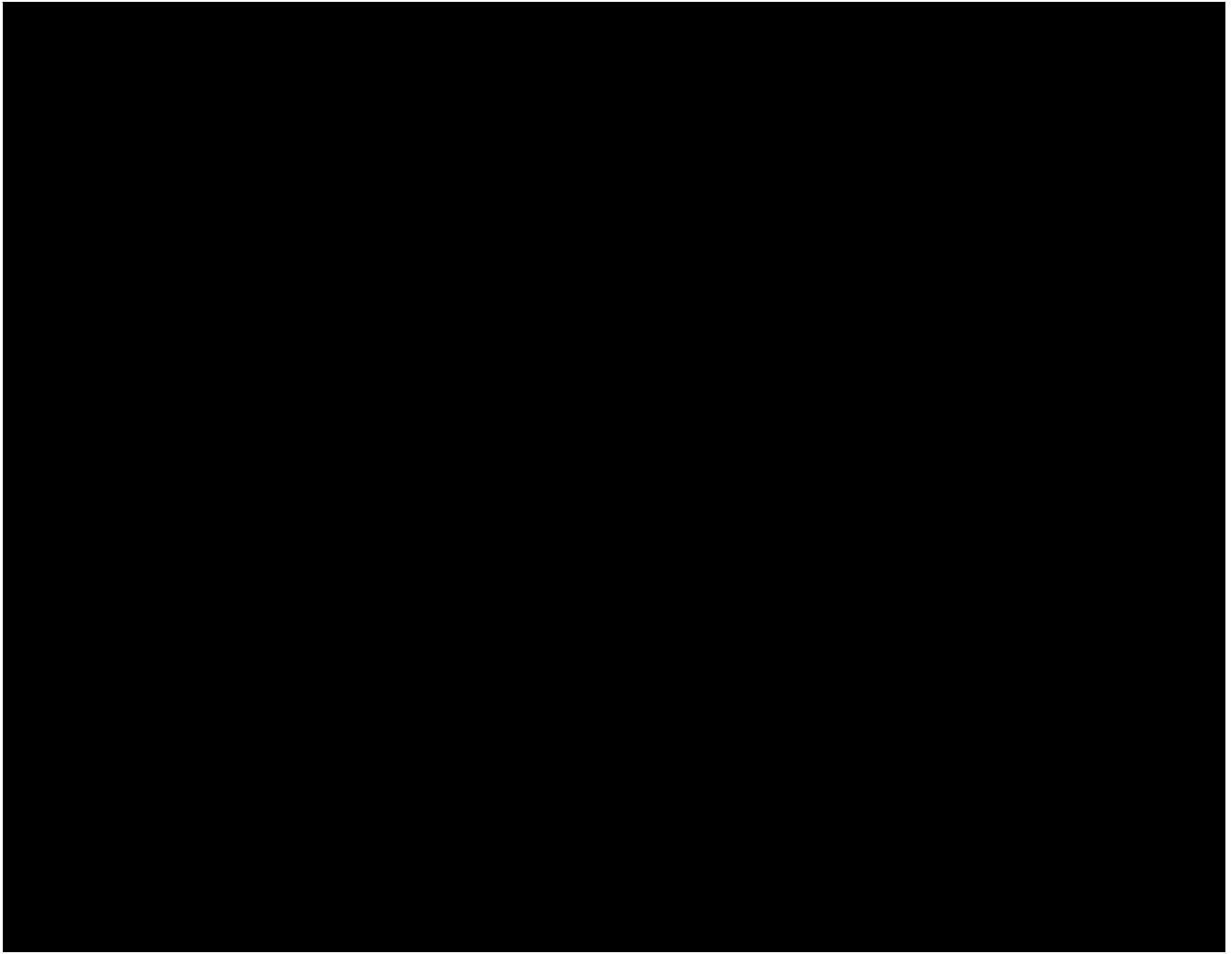


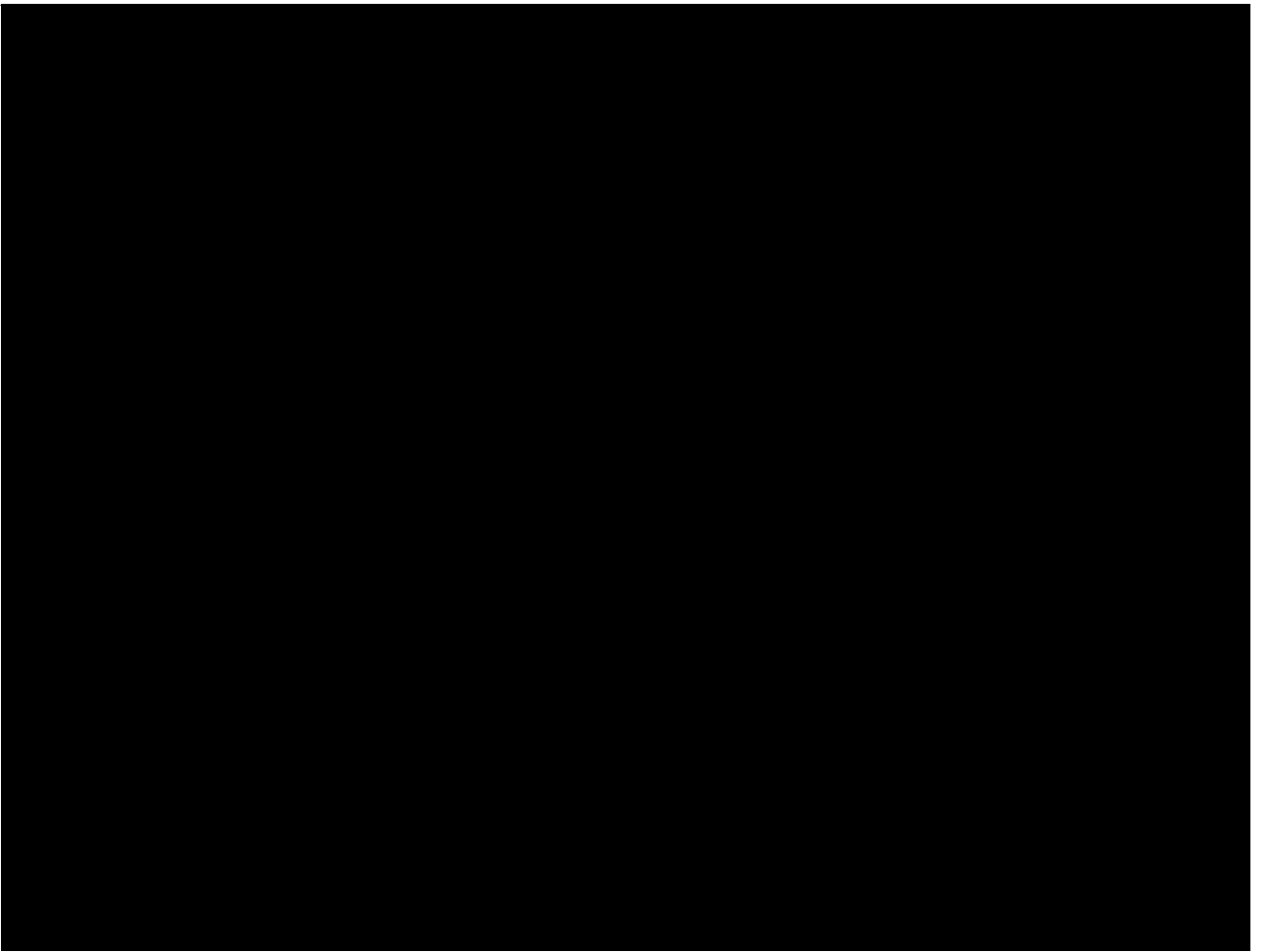
Designing for **slogans**

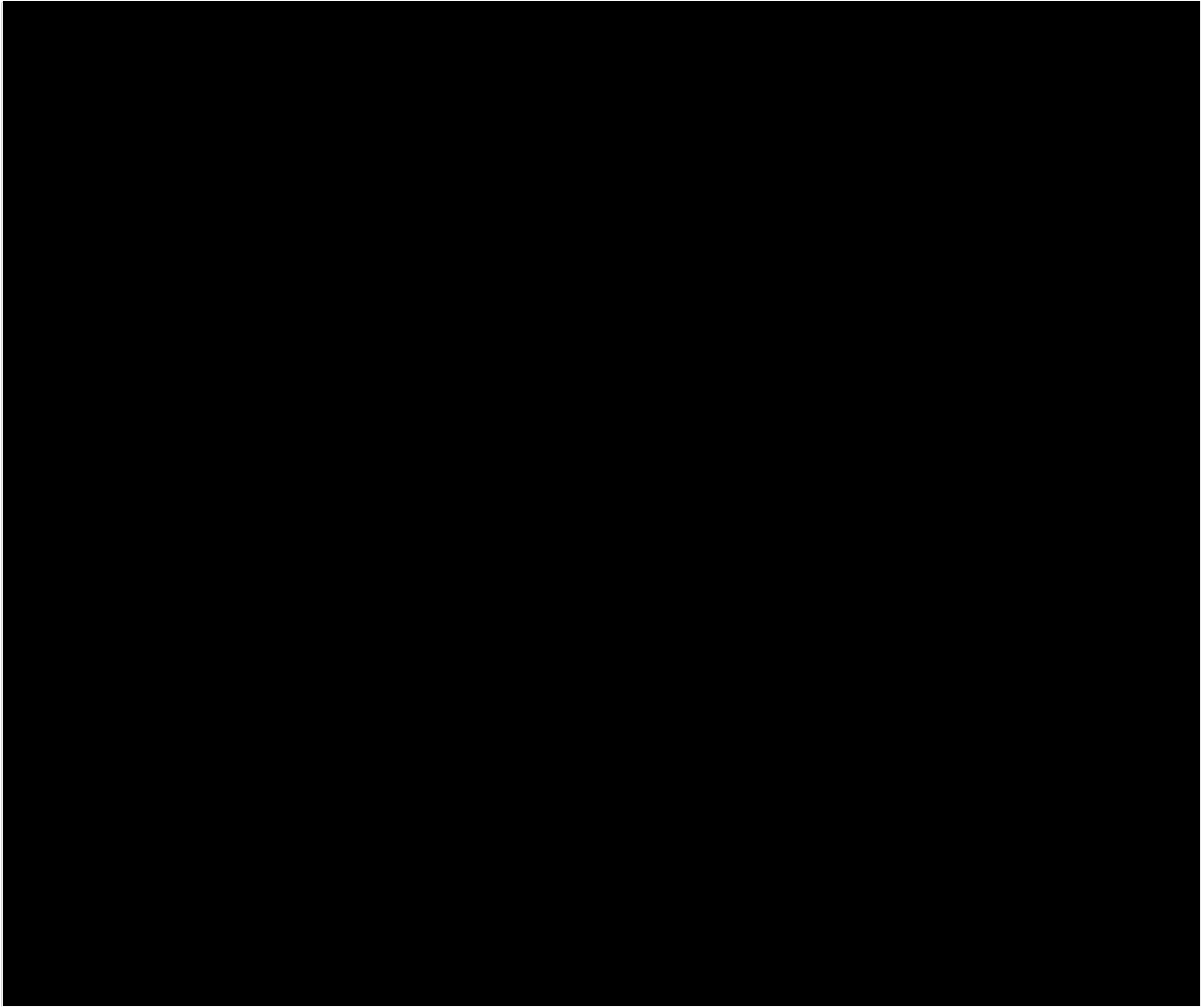
Before jumping to solutions, what simple **slogans** (or "clean statements") would we like to be able to make?

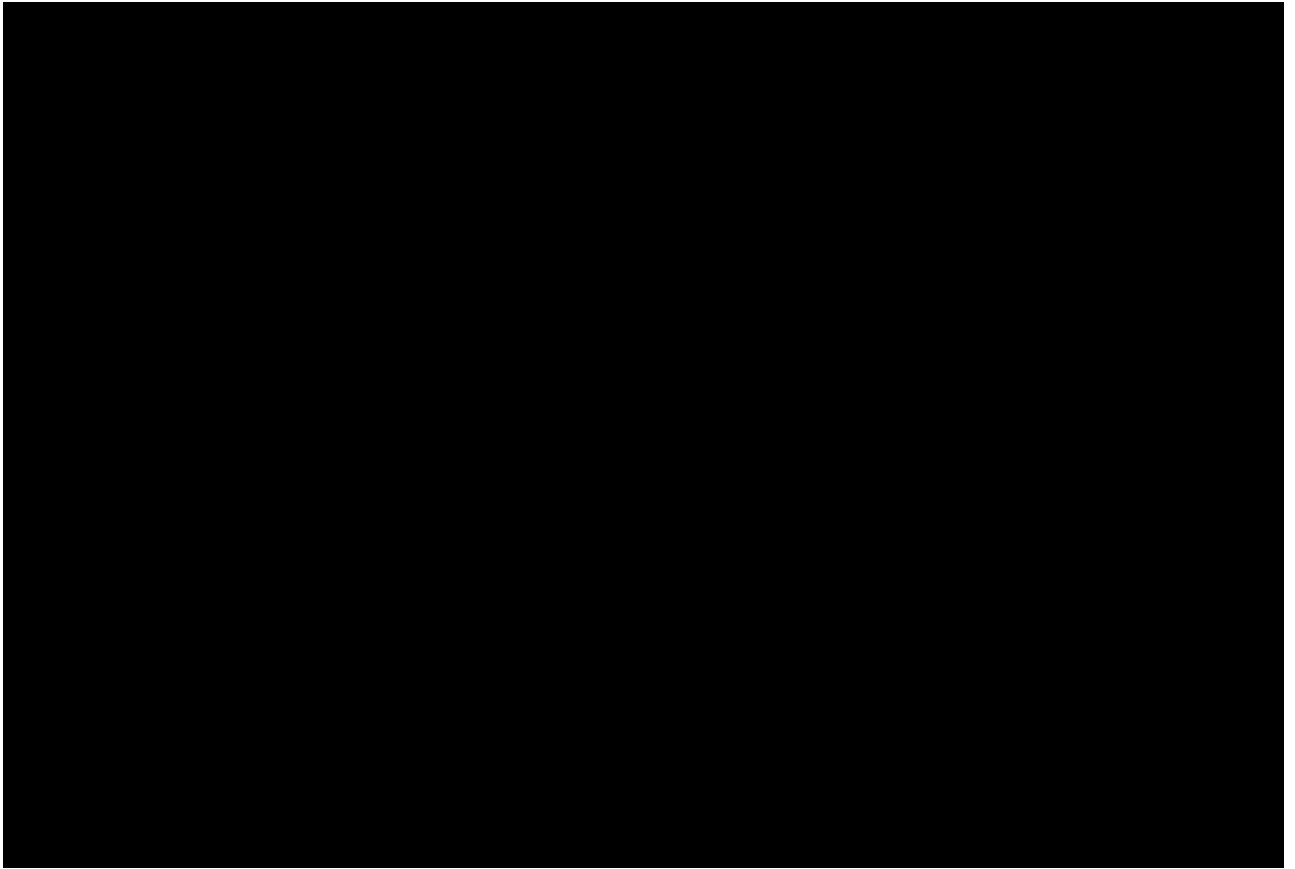
- Search doesn't **track** you.
- We give you **control** over what data we collect.
- **Ads** target your search query, not you.
- Search doesn't put you in a personalized **filter bubble**.

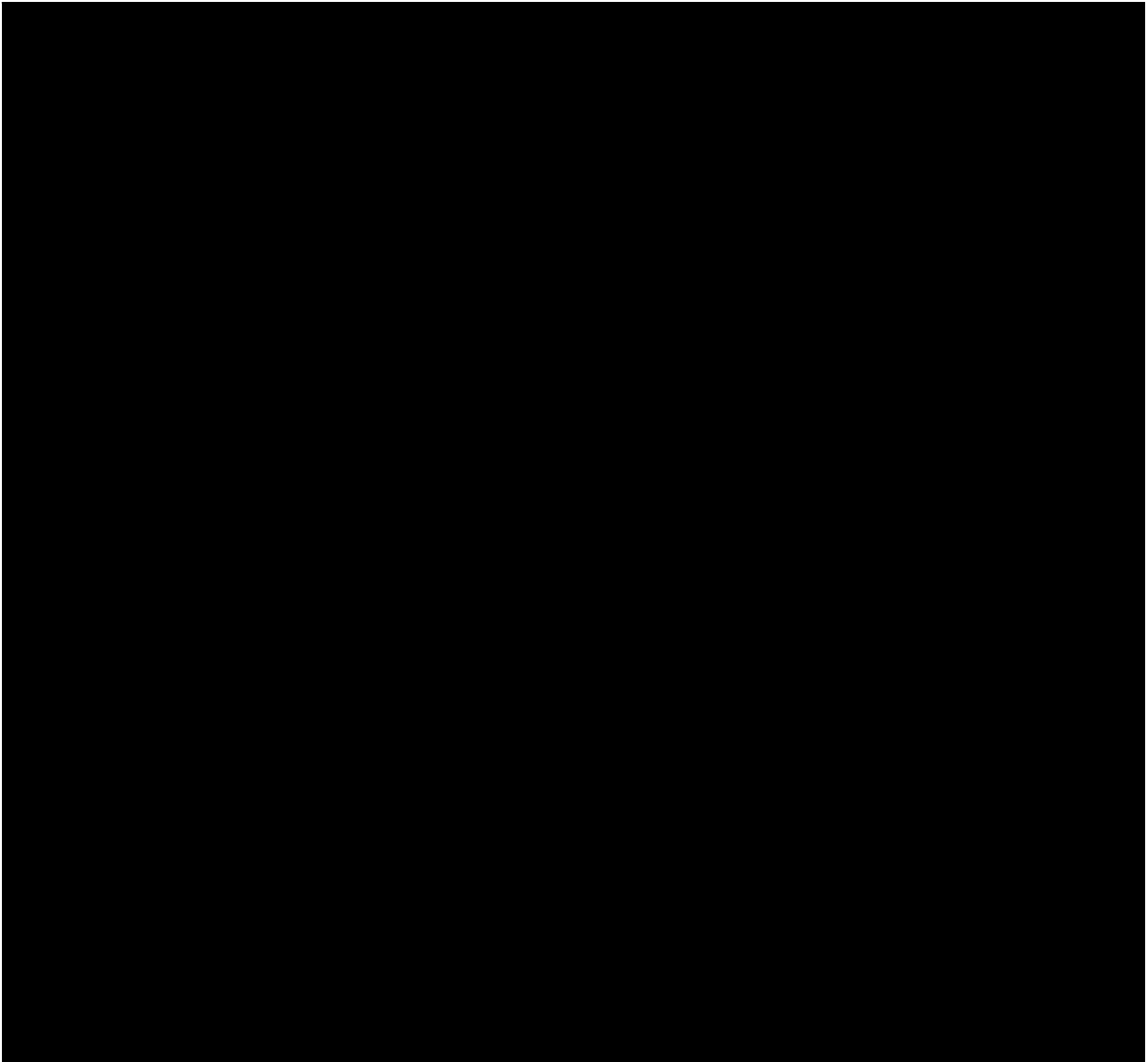


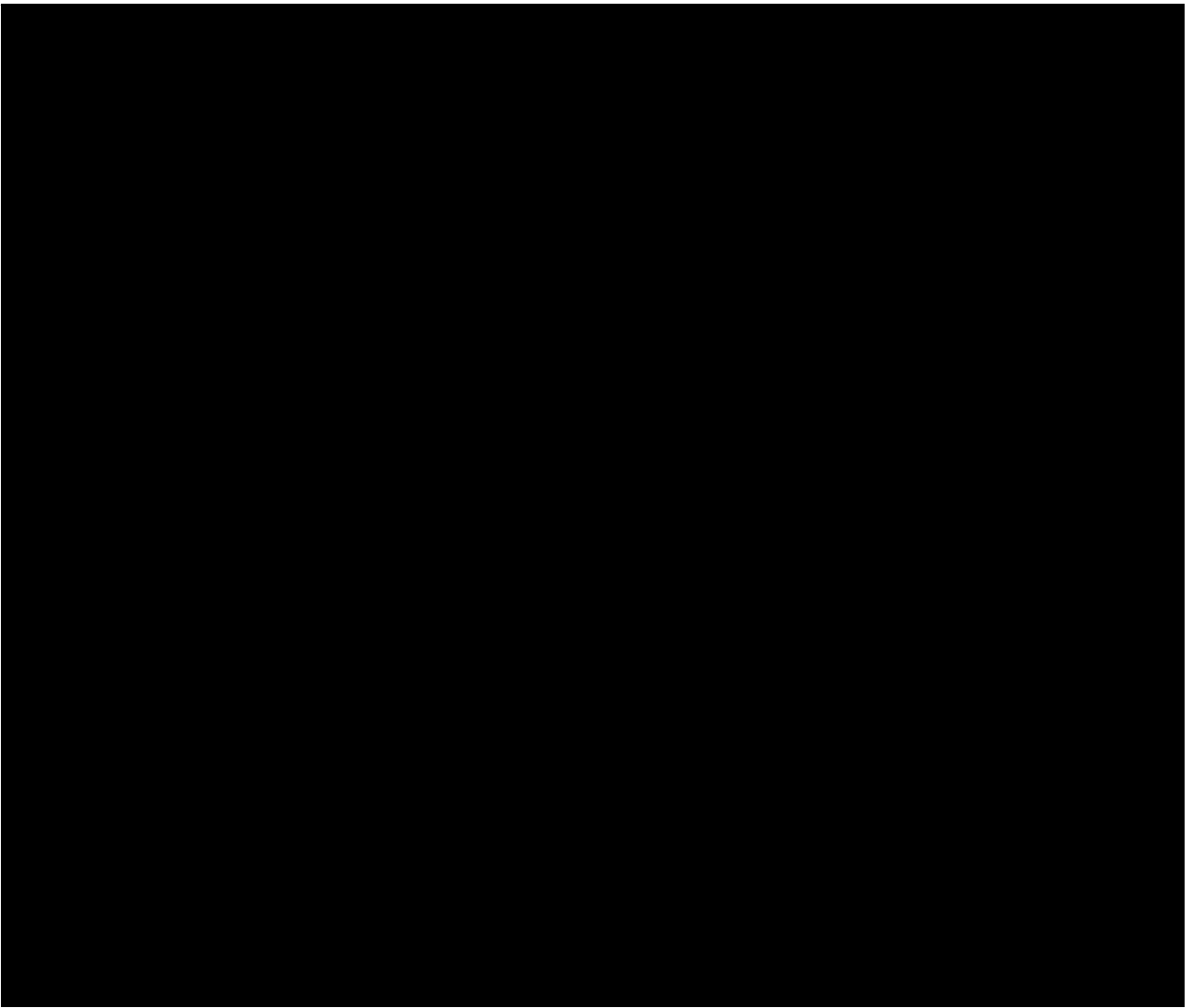


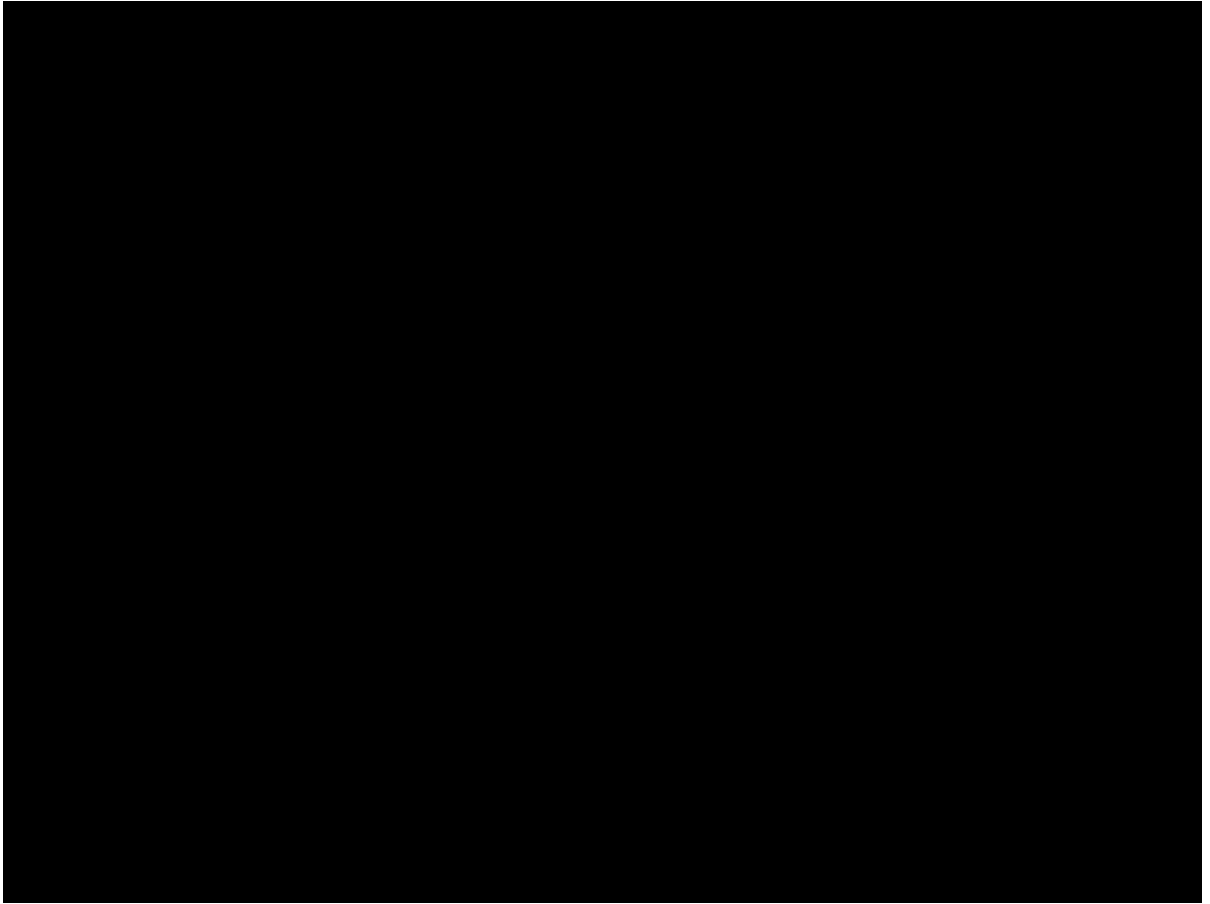


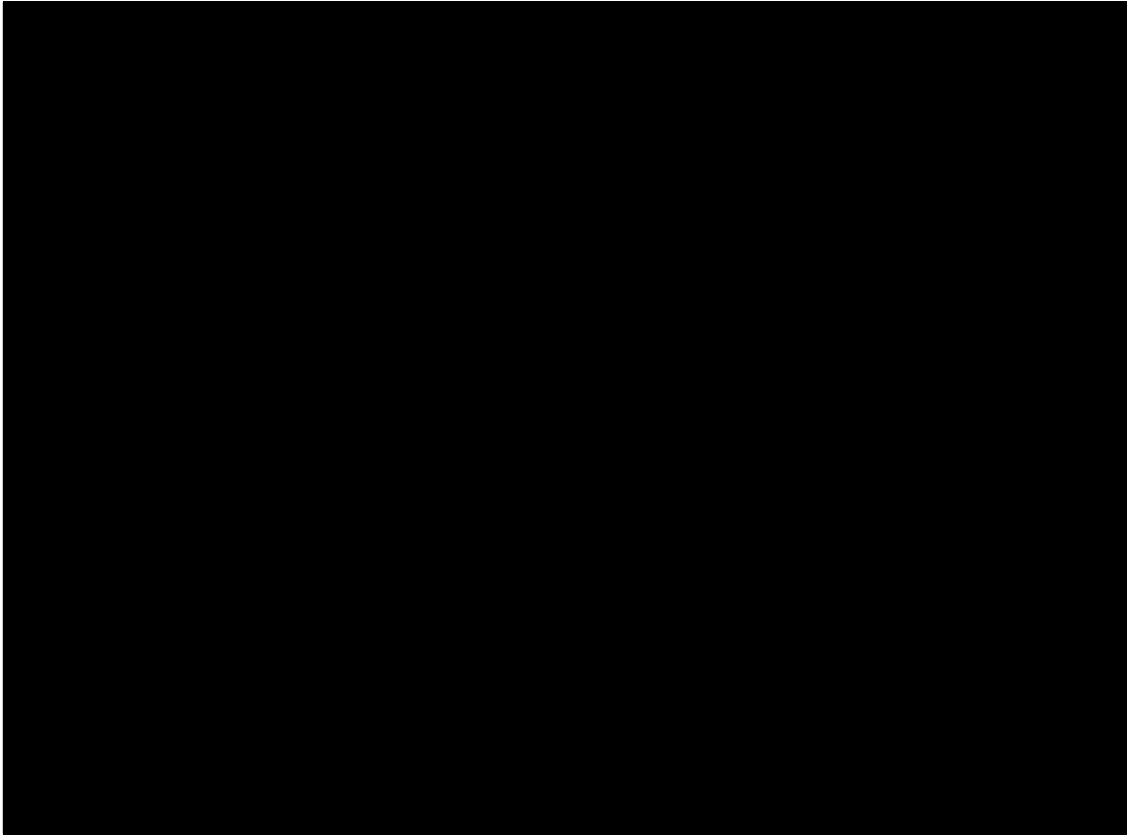


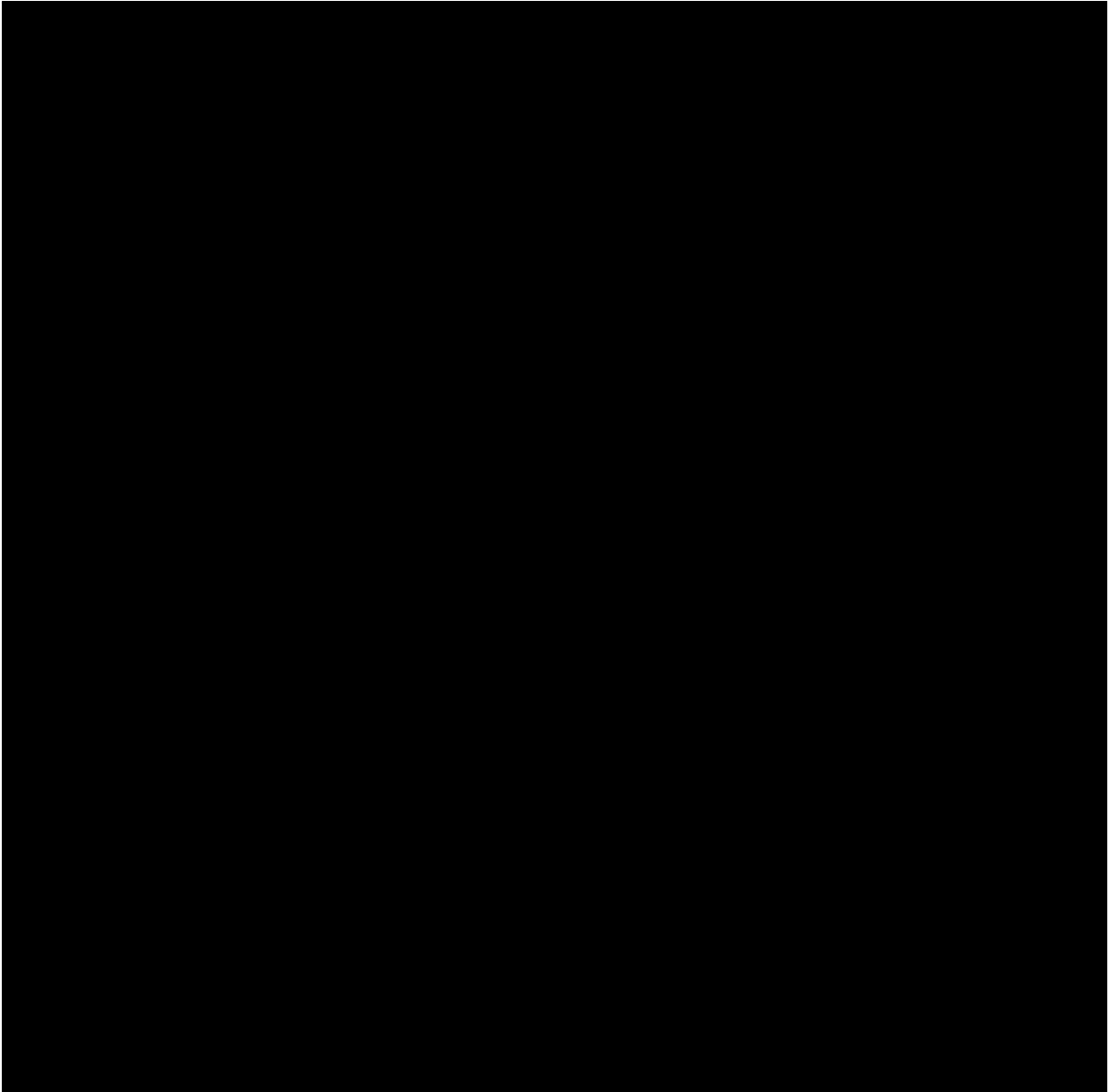


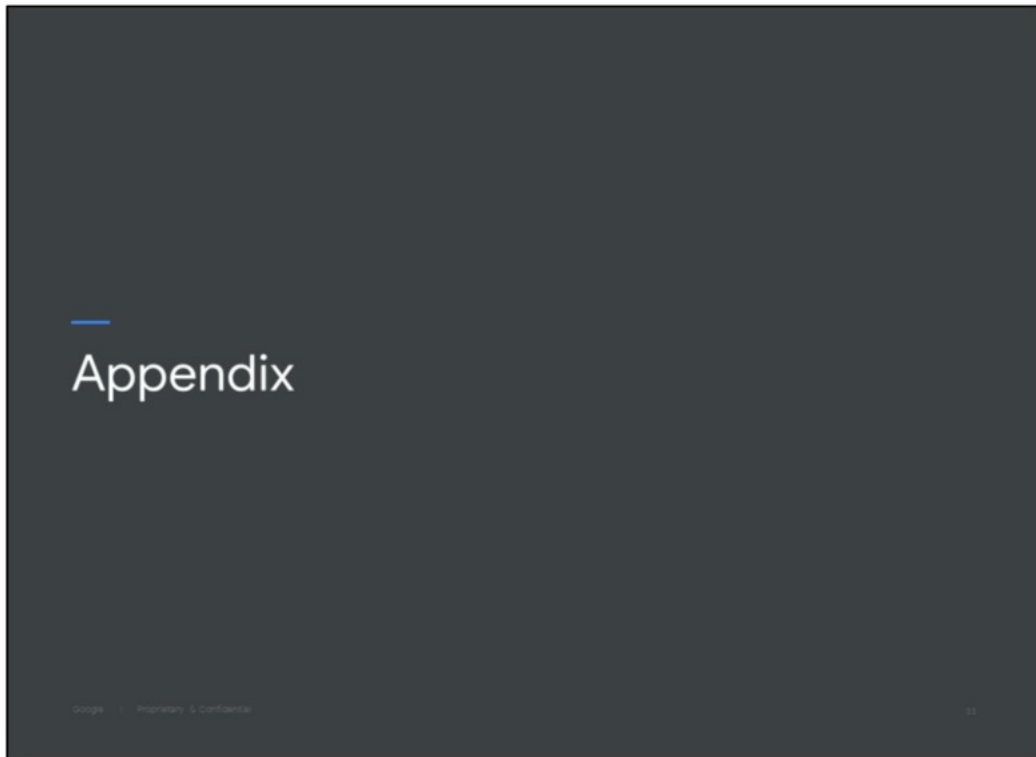


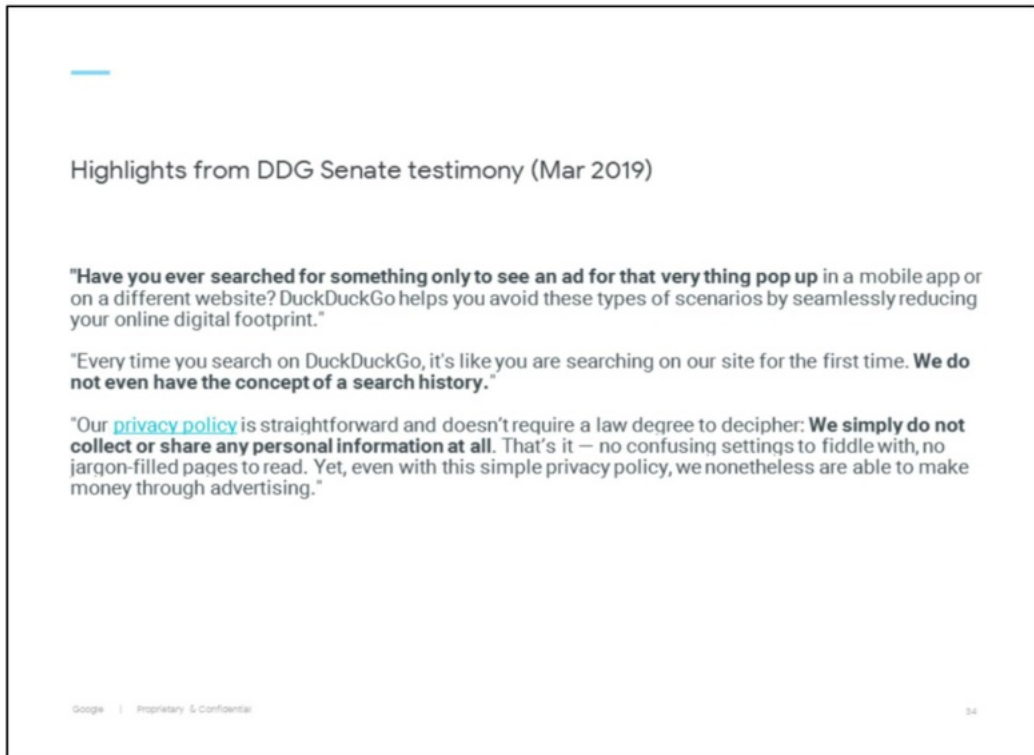












Highlights from DDG Senate testimony (Mar 2019)

"Have you ever searched for something only to see an ad for that very thing pop up in a mobile app or on a different website? DuckDuckGo helps you avoid these types of scenarios by seamlessly reducing your online digital footprint."

"Every time you search on DuckDuckGo, it's like you are searching on our site for the first time. **We do not even have the concept of a search history.**"

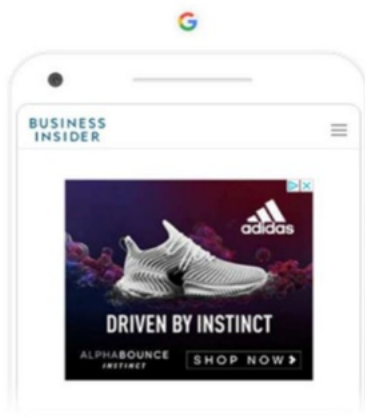
"Our [privacy policy](#) is straightforward and doesn't require a law degree to decipher: **We simply do not collect or share any personal information at all.** That's it — no confusing settings to fiddle with, no jargon-filled pages to read. Yet, even with this simple privacy policy, we nonetheless are able to make money through advertising."

Google | Proprietary & Confidential 34

Source: <https://spreadprivacy.com/us-senate-testimony/>

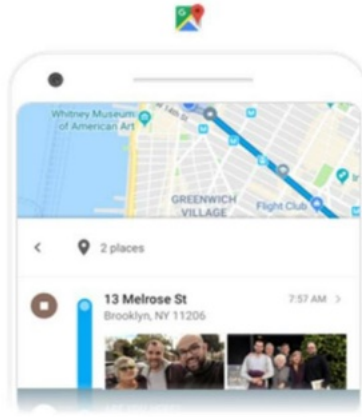
Recent research around trigger moments

The surprise you feel when you encounter data personalization you didn't expect, positive or negative.



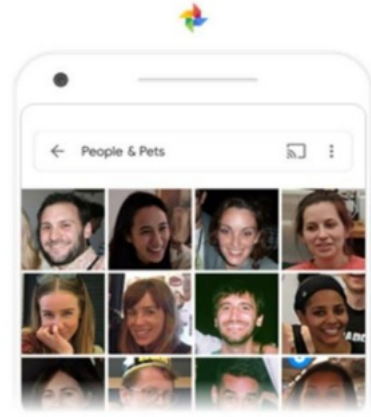
Perceived misuse of my personal information.

"Why is Google showing me this ad everywhere?"
"Is Google selling my information?"



Lack of control over features involving personal info.

"Is Google always tracking where I am?"
"When did I tell Google where I took these photos?"

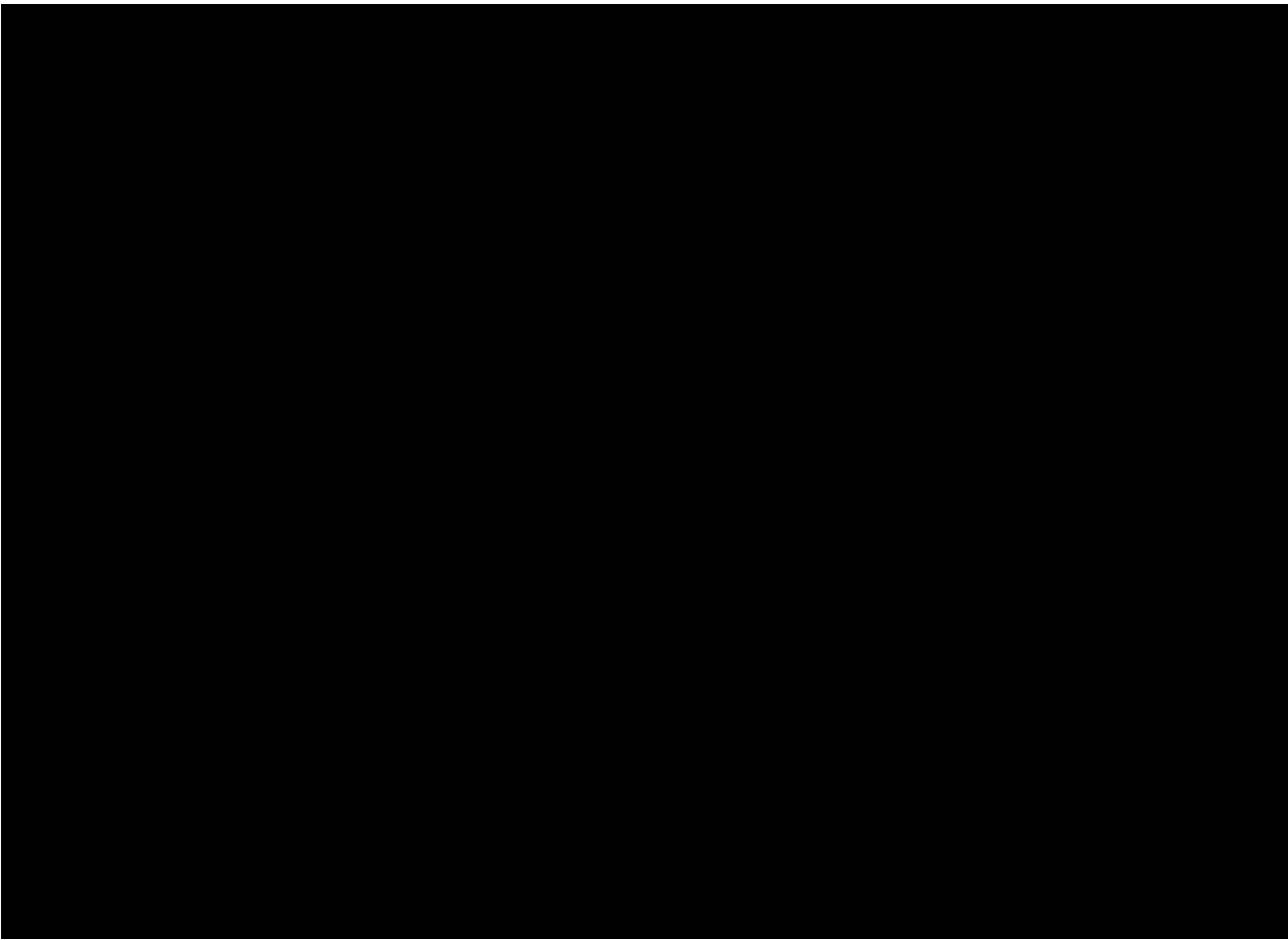


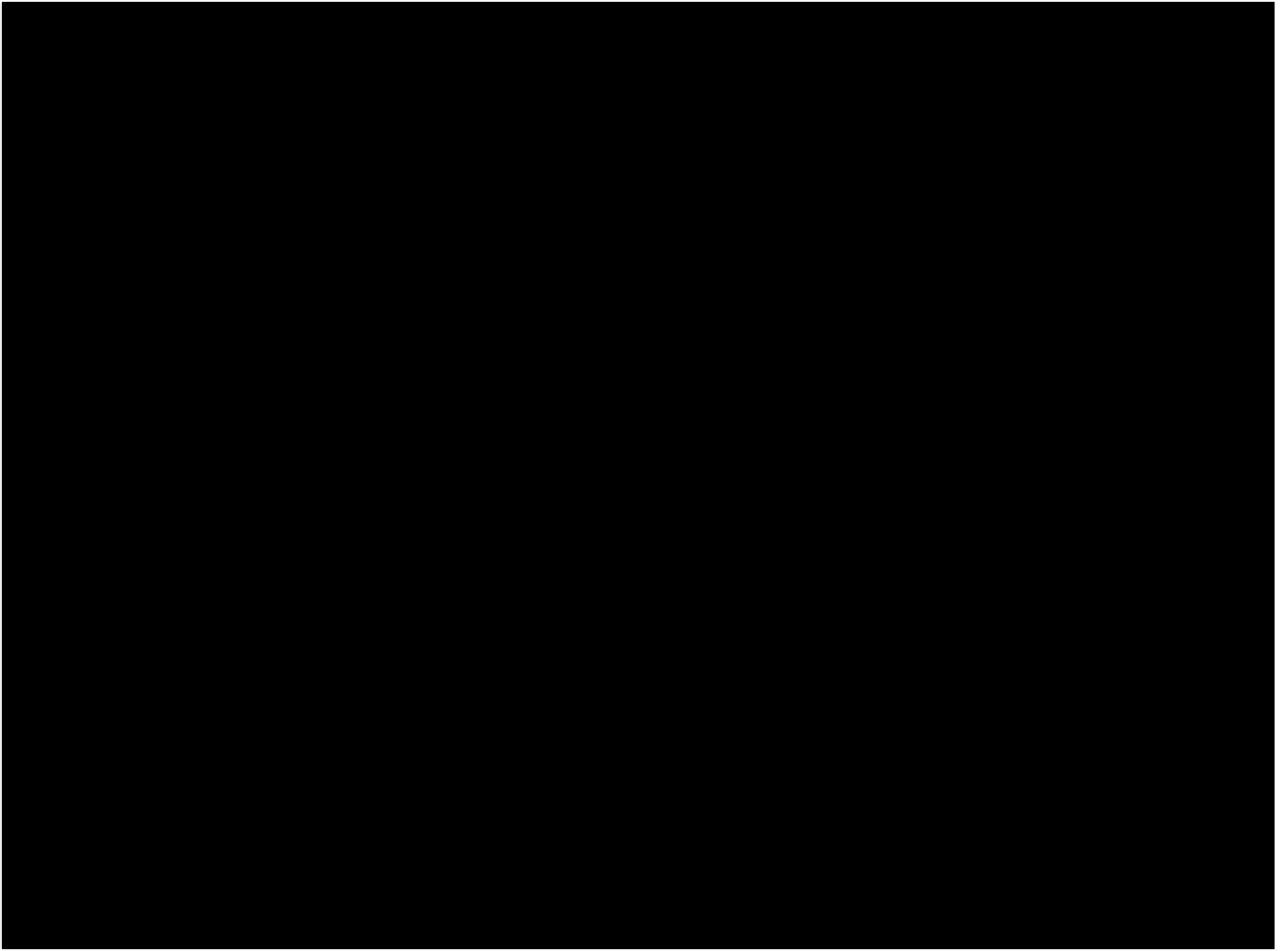
Uncertainty about how something works.

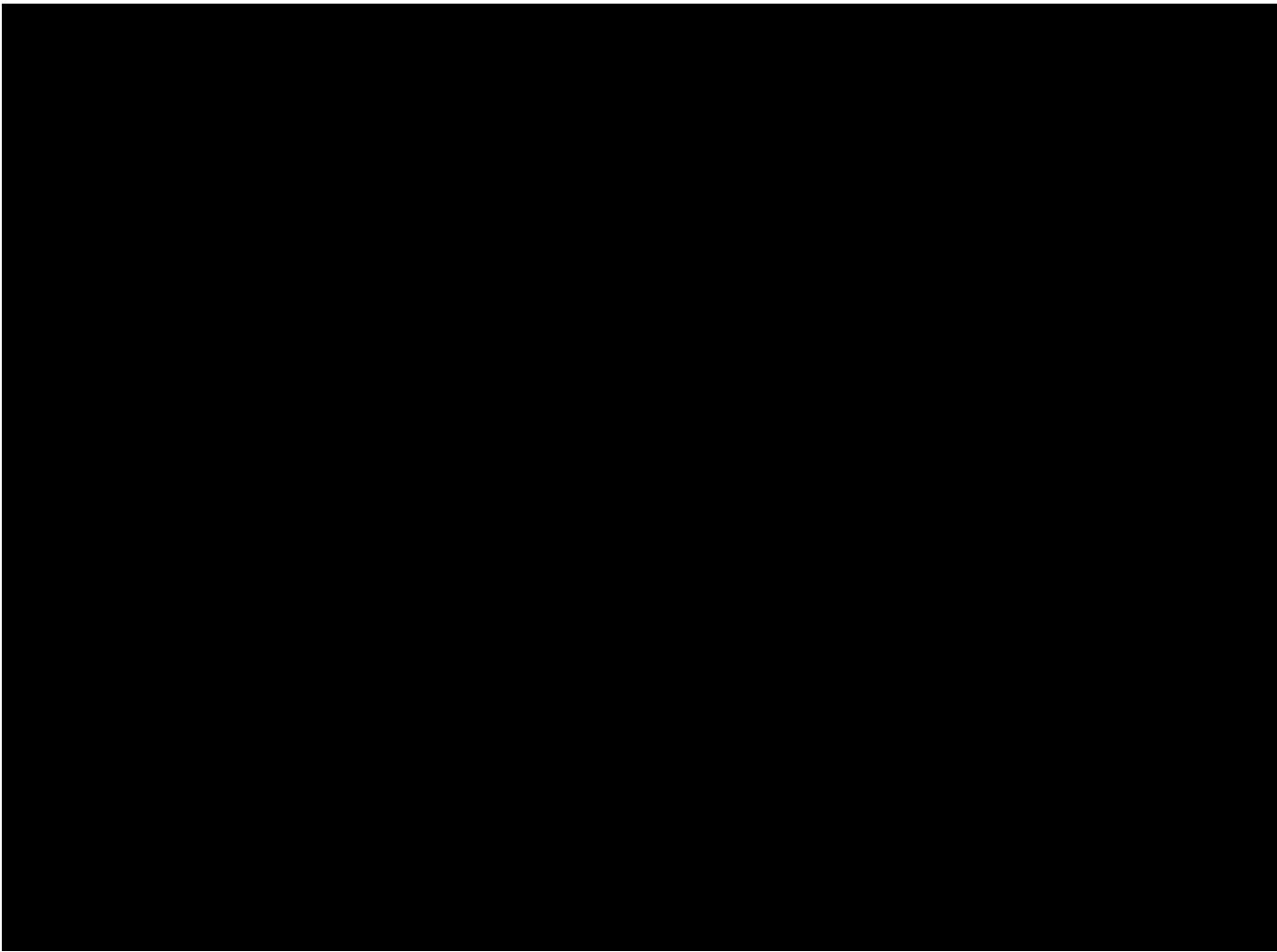
"How does Google know how to recognize my friends?"
"What else is Google tracking?"

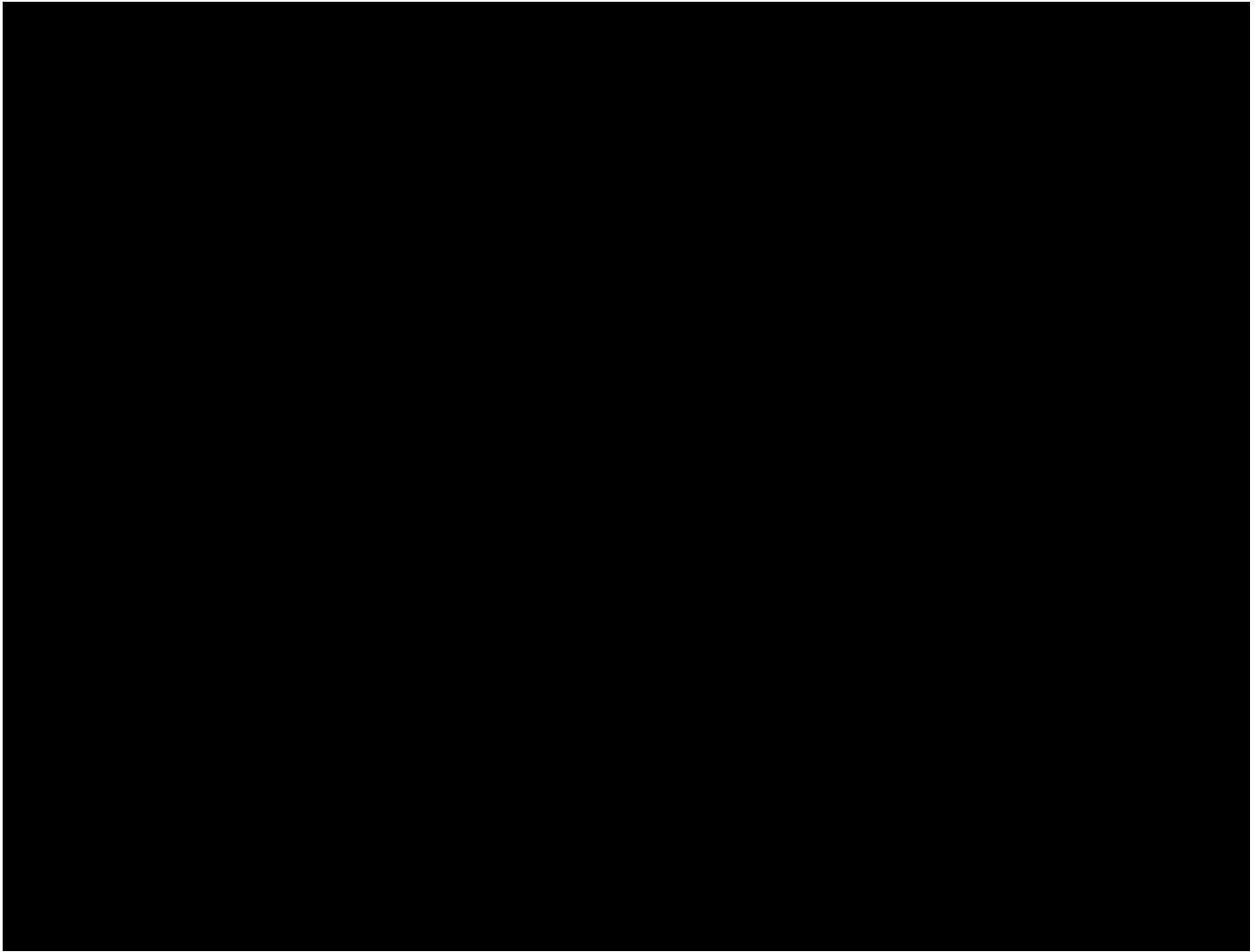
Google

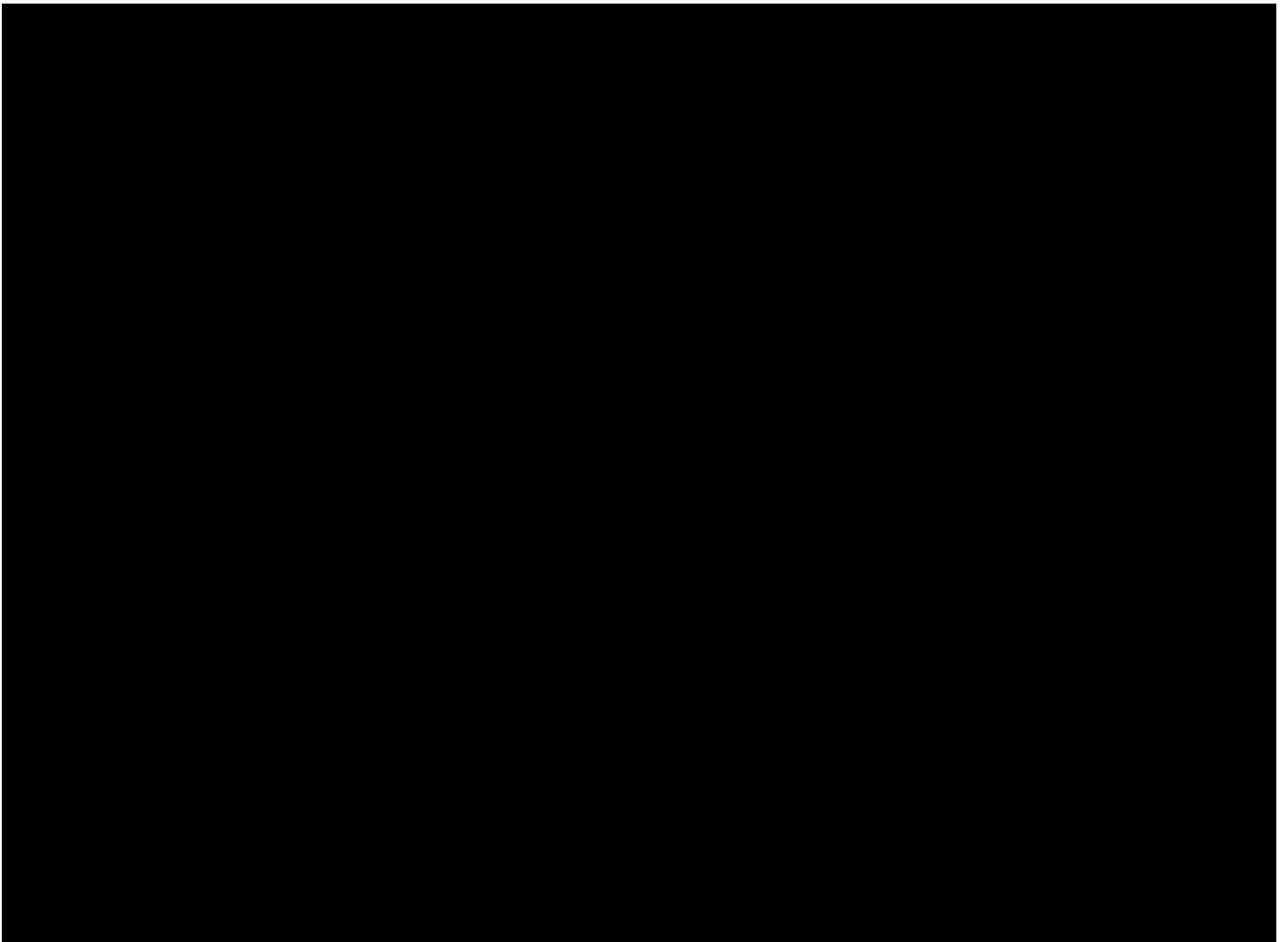
Privileged + confidential

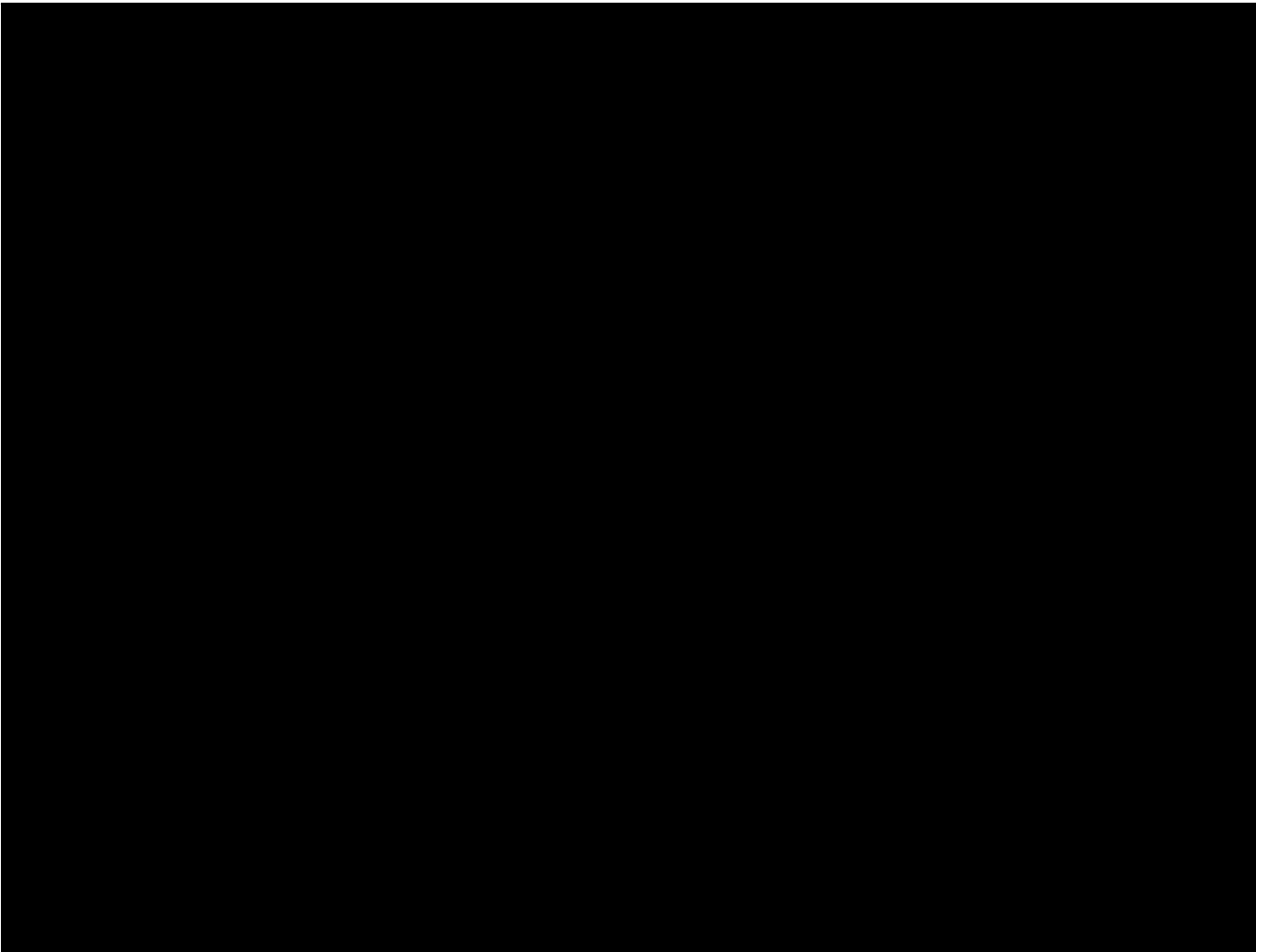












Searches can be very private

My wife is pregnant is searches Incognito many times per week because she doesn't want Google to "know things about her" or her coworkers to "see" things she's searched for that might pop up somewhere at work.

But she uses Facebook & Instagram every day with no qualms (she already assumes anything she does there is widely visible). And she buys everything on Amazon.

Search history can contain some of the **most private** online activity:

- Health info
- Info about sexual orientation, or religion
- Controversial political topics
- Porn
- etc
- (We can try to filter this out, but if users already doubt whether to trust us, will they feel safe?)